



ISL Uranium Mining

Richard J. Abitz, PhD
Principal Geochemist & Owner
Geochemical Consulting Services, LLC



What is uranium?

Heaviest naturally occurring element
about as abundant as arsenic and molybdenum
primary risk is as a heavy metal poison

Three radioactive isotopes: U-238, U-235 & U-234

Radioactive isotopes radiate energy when they decay
alpha & beta particles; gamma rays

Number of decays per gram depends on half life
shorter half life means more radiation

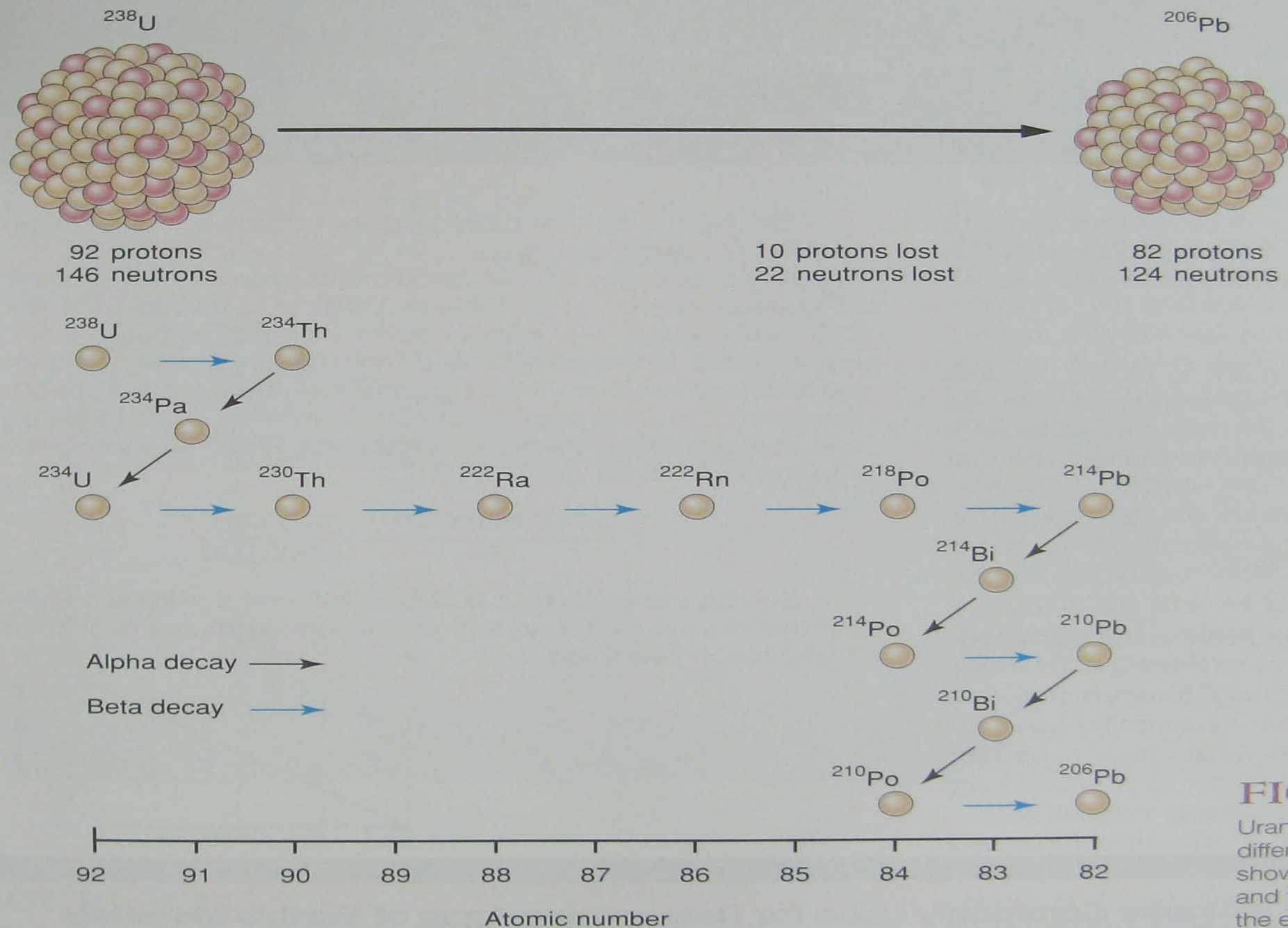


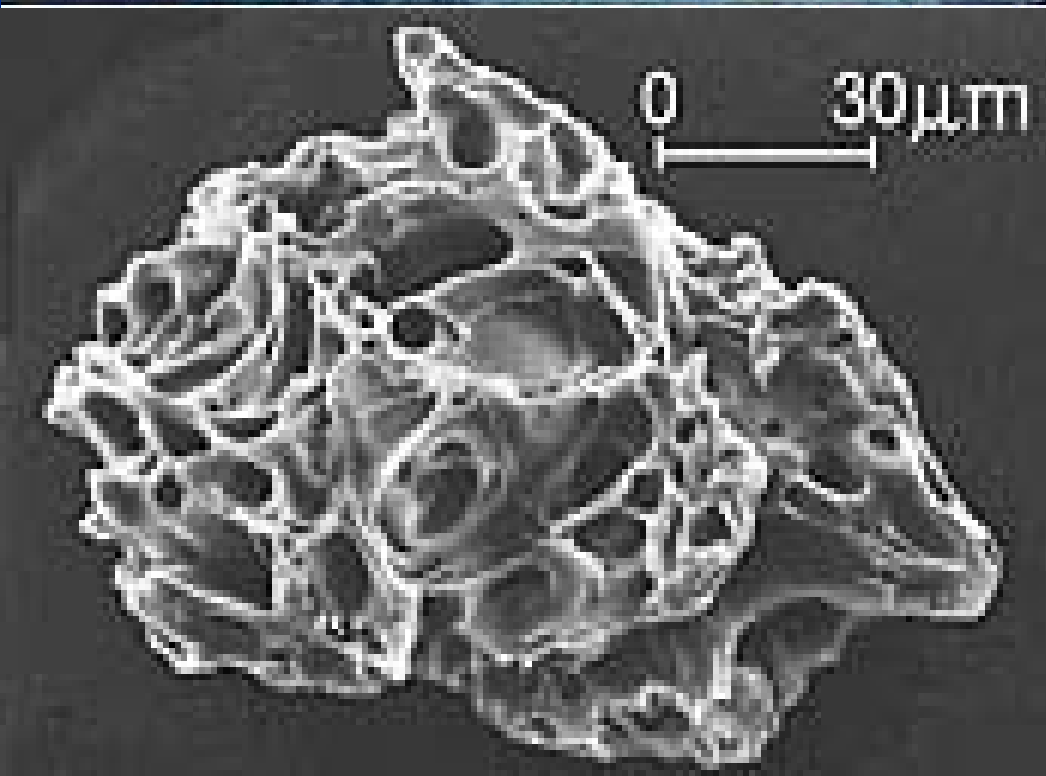
FIG
 Uranium
 different
 shown
 and ^{206}Pb
 the ele



What is the source for the uranium found in sandstone ore deposits?

Most economic geologists cite volcanic ash
uranium 5 to 20 ug/g
easily leached and mobilized

Initial low-grade deposits are oxidized and moved
secondary deposits can be higher grade





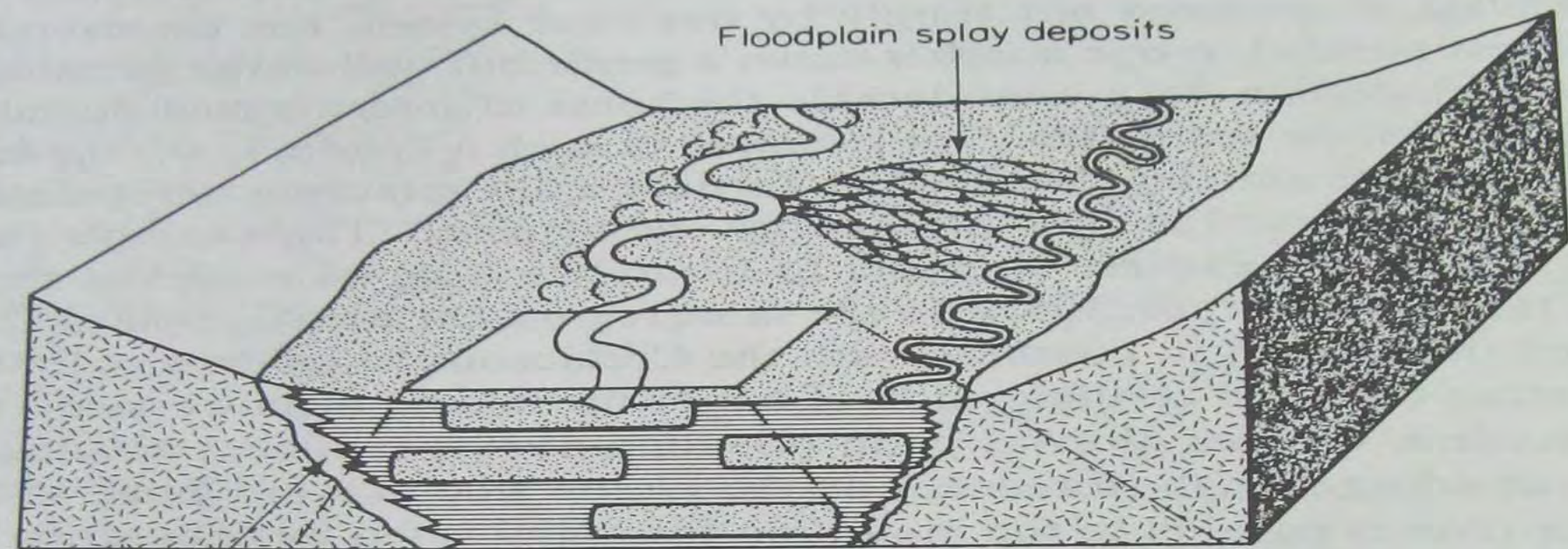


How does a uranium ore deposit form in a fluvial sandstone?

Uranium is transported to a reducing zone
decayed plant debris along stream channel
oxidation-reduction front in buried deposits

Formation of an ore deposit takes hundreds of
thousands to millions of years

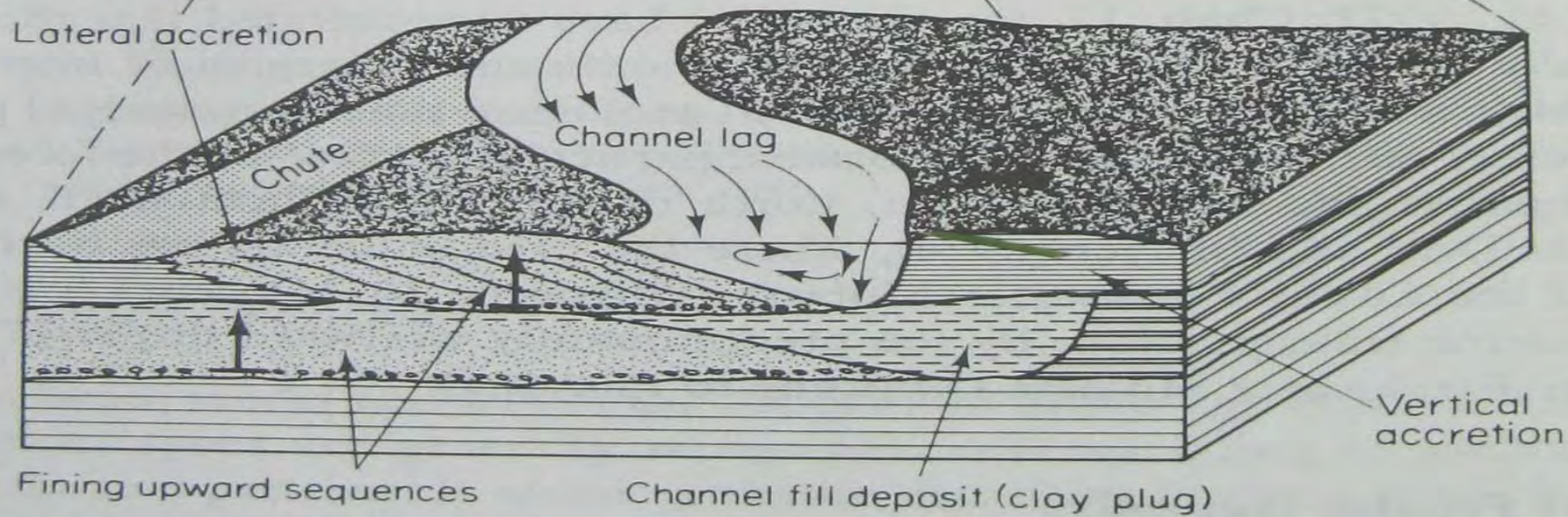
Principal types are stratabound and roll front



Colluvial deposits

(a)

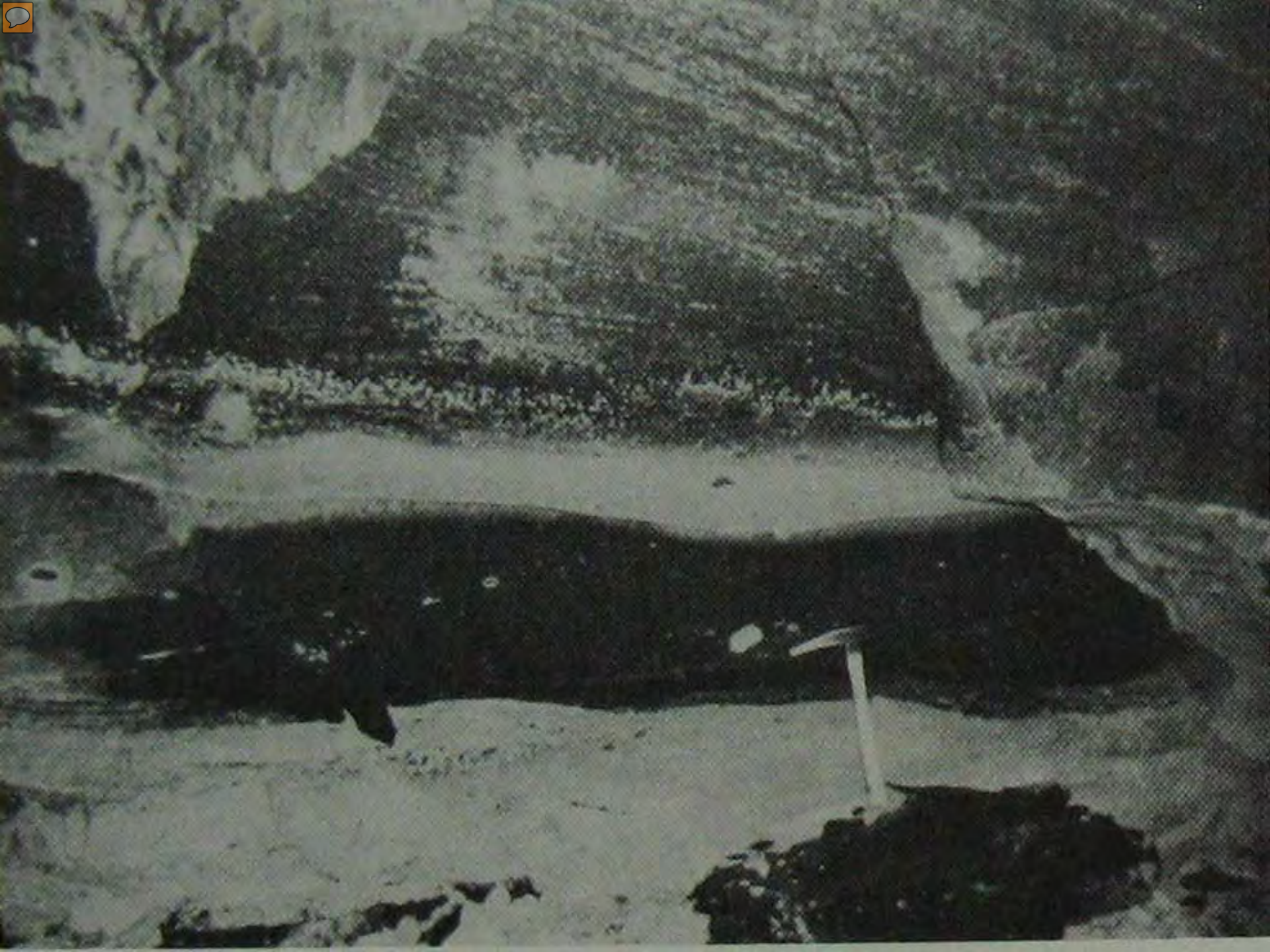
Lateral accretion




Vertical accretion

Fining upward sequences

Channel fill deposit (clay plug)







What is the composition of a uranium ore deposit?

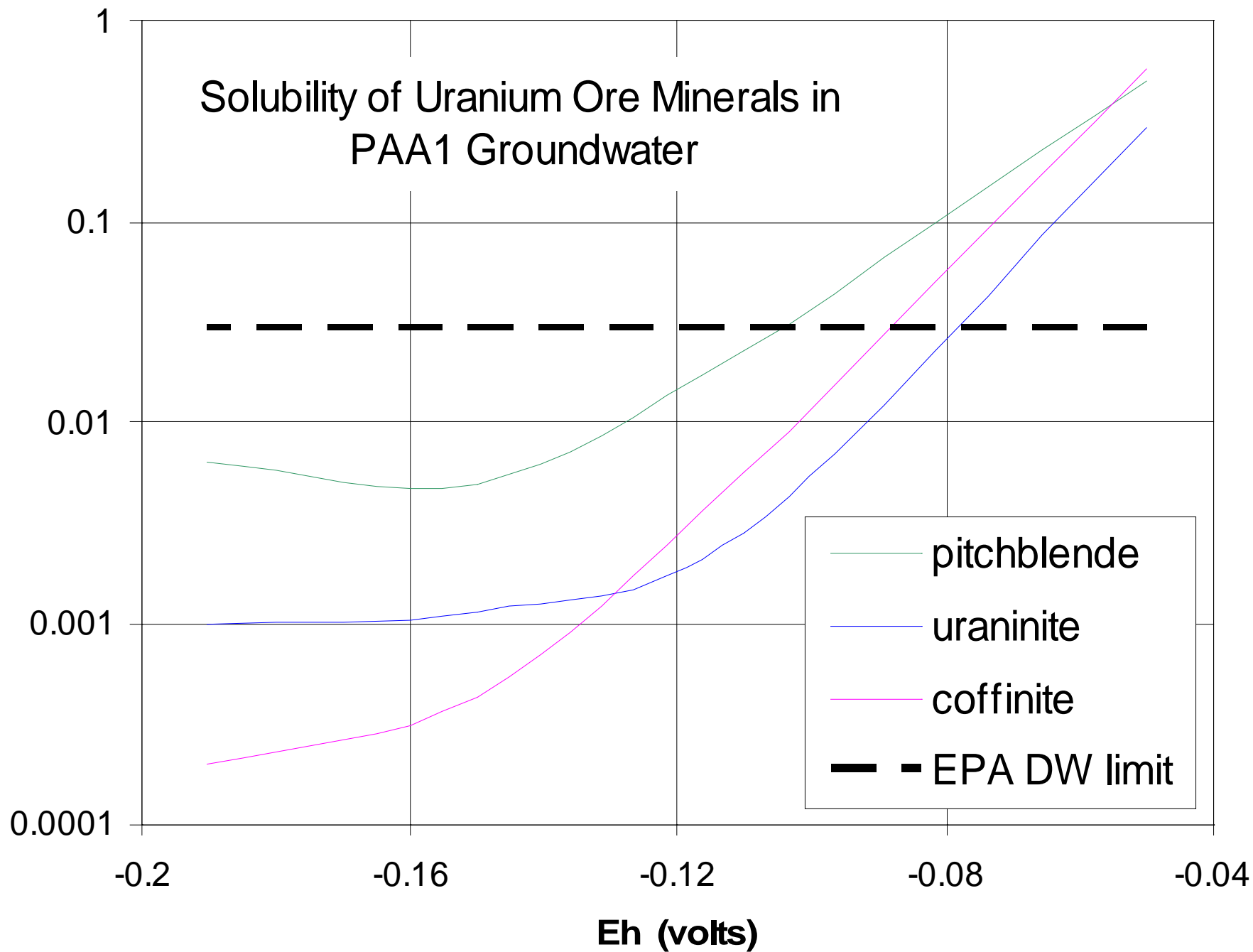
Greater than 99 percent of the rock is quartz, feldspar and clay minerals with minor amounts of carbonate and iron minerals

Uranium ore minerals are less than 1 percent of rock generally 0.1 to 0.5 percent of the rock

pitchblende, uraninite, coffinite, carnotite, autunite

Solubility of Uranium Ore Minerals in PAA1 Groundwater

Uranium (mg/L)





How is the uranium mined?

Conventional – underground mining
extensive surface tailings (rock waste)
Karnes County

ISL Operations – solution mining
inject chemicals to dissolve ore
Kleberg County



What are the ISL Operations?

Identify the ore body with exploratory drilling

Establish baseline water quality & extent of ore

Construct processing facilities, well fields, pipelines, pump houses and tank farms

Inject barren lixiviant and extract pregnant lixiviant

Run pregnant lixiviant through ion exchange



What are the ISL Operations?

Refortify the stripped lixiviant and reinject

Backwash ion exchange columns to strip uranium

Evaporate uranium solution to produce yellow cake

Package and ship the product to enrichment facility

Restore groundwater and surface conditions

Rice (2006) provides details on some operations



What type of monitoring is performed?

Air – radon, particulate and direct radiation

Water – surface pipes and ponds, groundwater

Soil – spills along pipelines and facility releases



Concerns with ISL Operations

Adequate oversight by the regulatory agency

Monitoring requirements for air, water, & soil

Laboratory splits on environmental samples

Comprehensive scientific review of permits



Concerns with ISL Operations

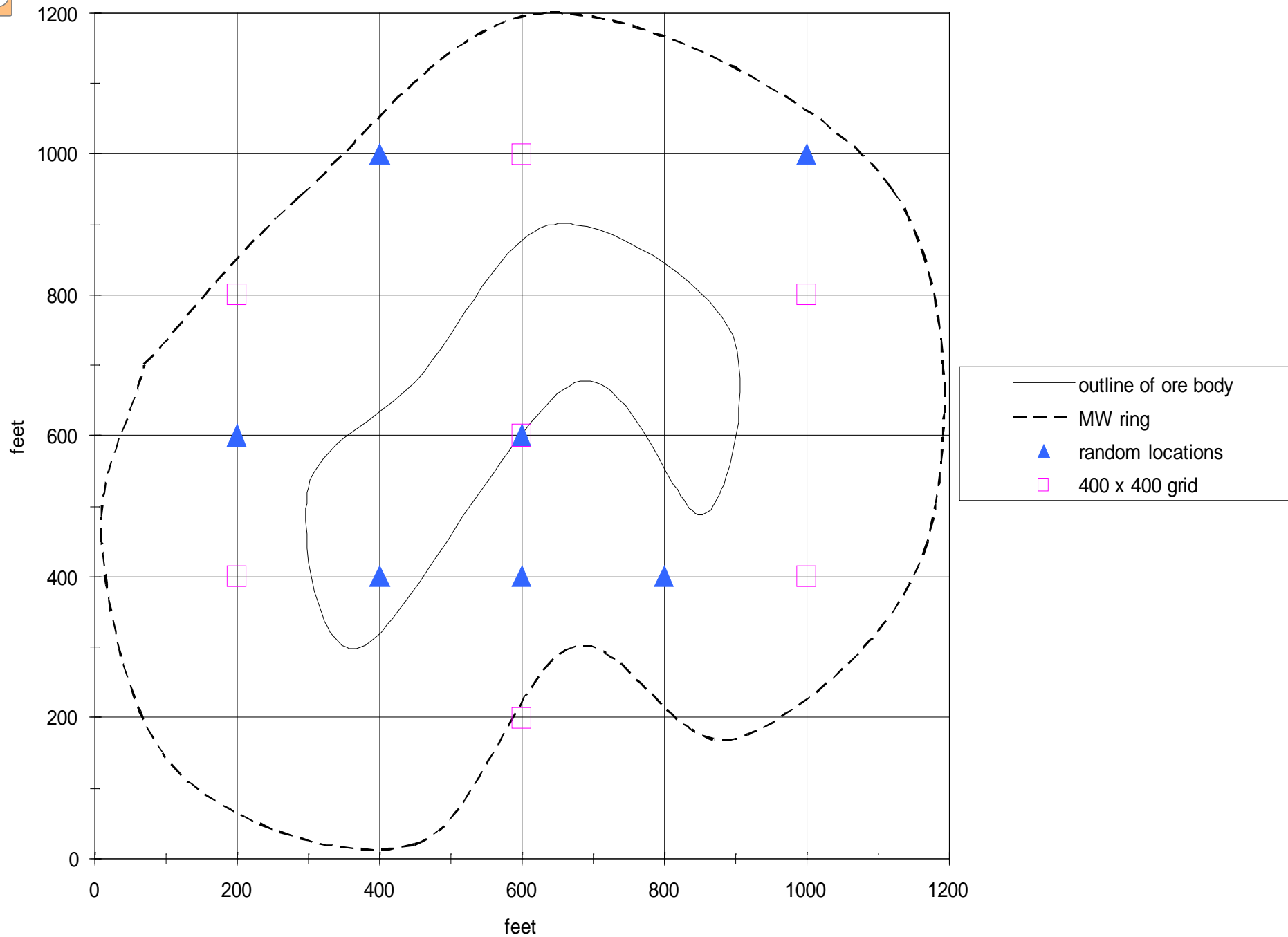
Establishing Baseline Water Quality

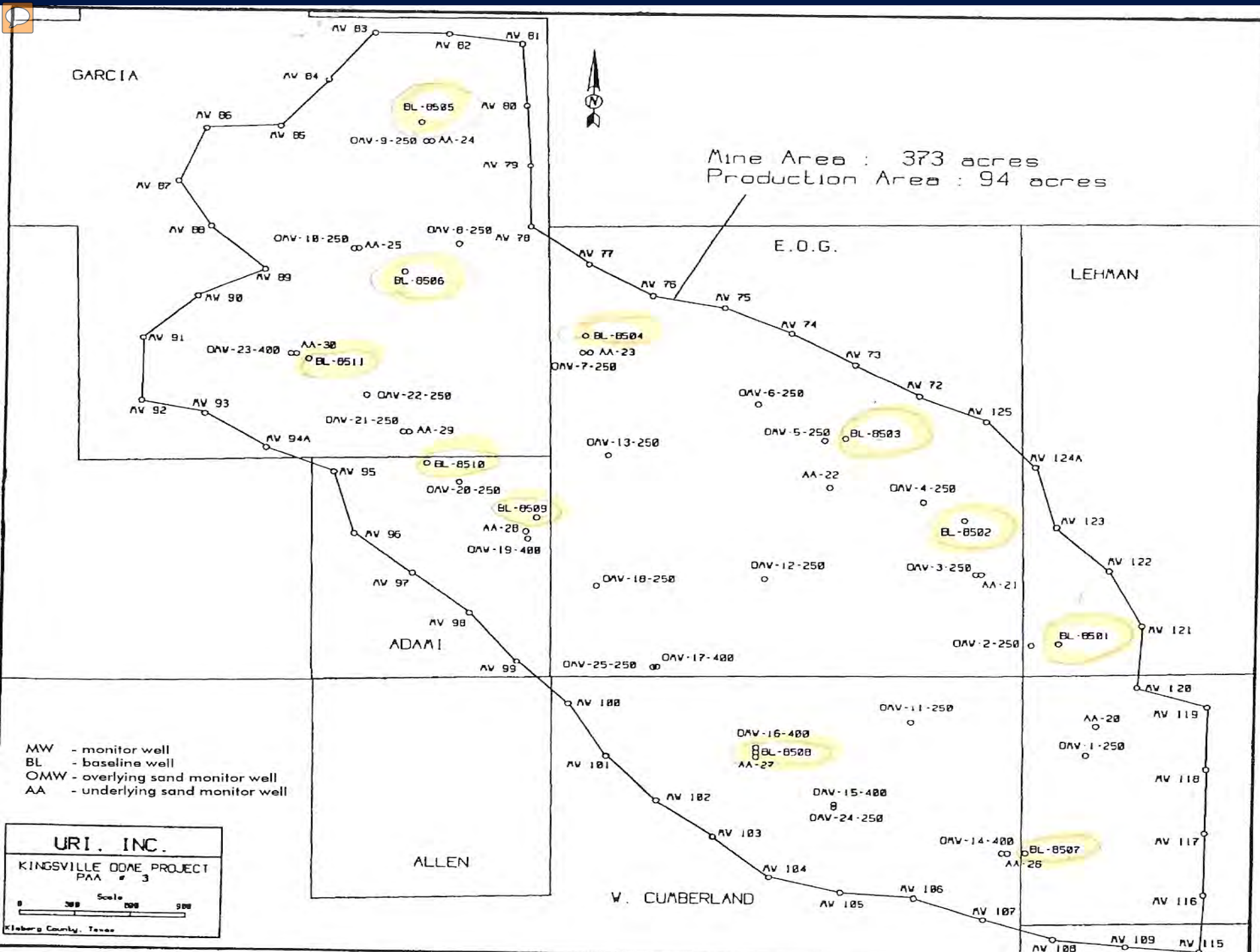
Within the MW ring for restoration values
random well locations on a grid
generally 1 well per 4 acres

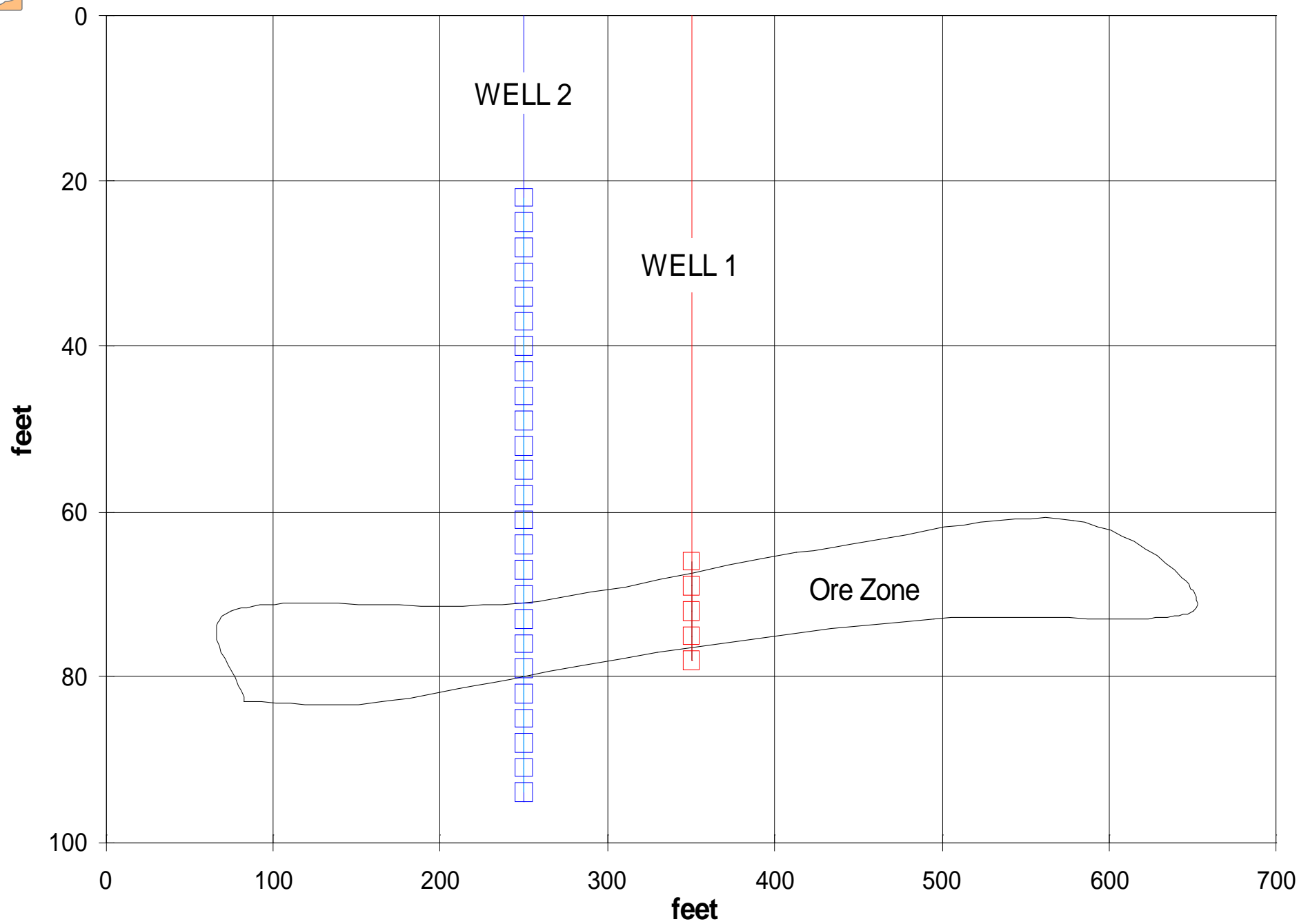
At the MW ring for excursion limits

Sample the entire thickness of the aquifer

Use valid statistical tests to analyze the data









Reference Documents for Proper Statistical Methods

Statistical Methods for Environmental Pollution Monitoring
(Gilbert 1987)

Prescriptions for Working Statisticians (Mandansky 1988)

Statistical Analysis of Groundwater Monitoring Data at RCRA
Facilities (EPA 1992)

Visual Sample Plan, Version 5.0 User's Guide
(PNNL 2007)



Evaluate Data Distribution

Normal, Lognormal or Other

Probability Plot

Shapiro-Wilks test for normality

Parametric vs Nonparametric Statistics

Mean, Standard Deviation, t-Test

Median, Quartile Range, Sign Test

**PAA-3 Baseline Wells
Pre-mining Water Quality Summary**

| Constituent | Units | Minimum | Average | Maximum |
|--------------------|--------------|----------------|----------------|----------------|
| Calcium | mg/L | 10 | 16 | 25 |
| Magnesium | mg/L | 1.5 | 3.8 | 6.0 |
| Sodium | mg/L | 203 | 387 | 480 |
| Potassium | mg/L | 7.7 | 16.1 | 31.0 |
| Carbonate | mg/L | 0 | 16 | 49 |
| Bicarbonate | mg/L | 95 | 165 | 321 |
| Sulfate | mg/L | 183 | 349 | 487 |
| Chloride | mg/L | 138 | 275 | 362 |
| Fluoride | mg/L | 0.00 | 0.19 | 2.10 |
| Nitrate (as N) | mg/L | 0.49 | 0.67 | 0.97 |
| Silica | mg/L | 17 | 20 | 23 |
| pH | SU | 7.69 | 8.70 | 9.6 |
| TDS | mg/L | 667 | 1143 | 1440 |
| EC | µmhos | 1120 | 1825 | 2820 |
| Alkalinity | mg/L | 78 | 162 | 263 |
| Arsenic | mg/L | 0.003 | 0.009 | 0.025 |
| Cadmium | mg/L | <0.0001 | NA | 0.0001 |
| Iron | mg/L | <0.01 | 0.01 | 0.04 |
| Lead | mg/L | <0.001 | NA | 0.001 |
| Manganese | mg/L | <0.01 | NA | 0.01 |
| Mercury | mg/L | <0.0001 | <0.0001 | <0.0001 |
| Selenium | mg/L | <0.001 | 0.014 | 0.063 |
| Ammonia | mg/L | <0.01 | 0.18 | 0.40 |
| Molybdenum | mg/L | 0.02 | 0.30 | 3.20 |
| Radium 226 | pCi/L | 0.3 | 23.3 | 78 |
| Uranium | mg/L | 0.032 | 0.351 | 1.54 |

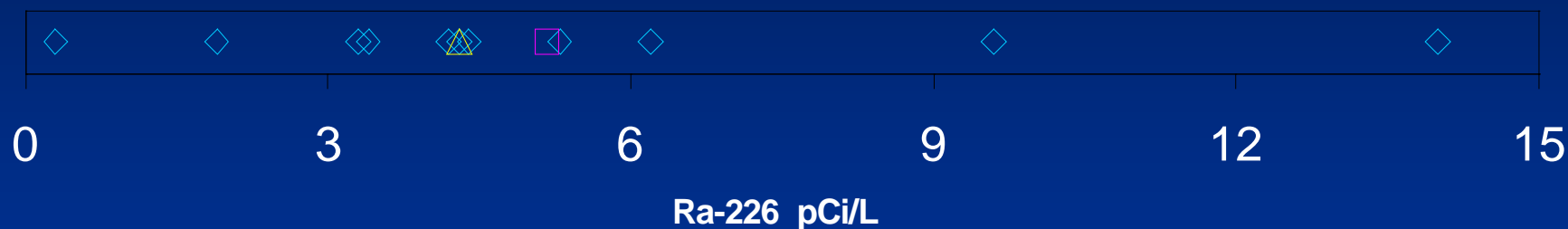
Source:
Rice (2006)

Effects of
URI's KVD
Mine on
Groundwater
Quality

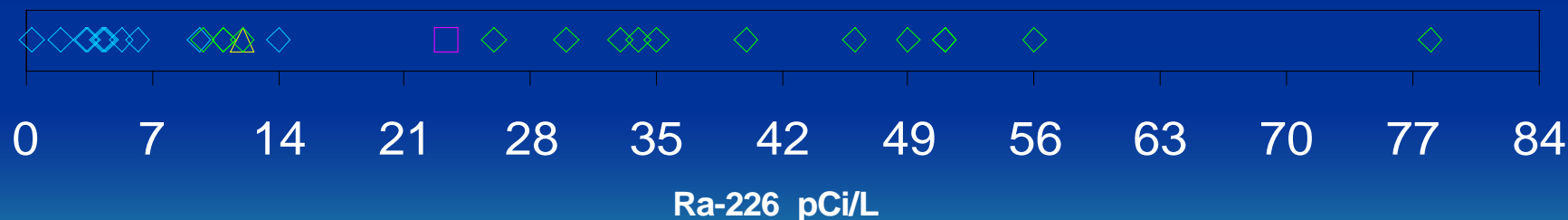


Ra-226 baseline at PAA3

Initially 11 baseline wells (BL8501 - BL8511)



16 additional wells added to baseline at a later date





Excursion Limits for MW ring

As noted in Appendix C of “Effects of URI's Kingsville Dome Mine on Groundwater Quality” (Rice 2006), excursion limits were improperly calculated at PAA1, PAA2 & PAA3

Present excursion limits for electric conductivity, chloride and uranium are arbitrary and statistically invalid

Guidance of NRC and EPA was not followed, which allows contamination to pass monitoring wells with no action taken



Proper Statistical Methods for Excursion Limits

Sample each well 3 to 4 times and use Shapiro-Wilkes test to evaluate the data distribution of each well

Perform ANOVA (normal or lognormal) to determine if the wells have ions with a similar range in concentration

If individual wells have similar ion concentrations, all wells can be used in the SWT.

Wells that fail SWT or those that have dissimilar ion concentrations must be treated independently



Proper Statistical Methods for Excursion Limits

If normal or log normal, calculate the upper tolerance limit for the wells that can be grouped, per ANOVA results

Individual wells that are not normal or lognormal must be evaluated independently using maximum value for the upper tolerance limit

Summary of tolerance limit calculations for PAA1, PAA2 and PAA3 in Appendix C of 'Effects of URI's Kingsville Dome Mine on Groundwater Quality' (Rice 2006)

Option to use Shewhart-cumulative sum chart for data that are distributed normal or lognormal



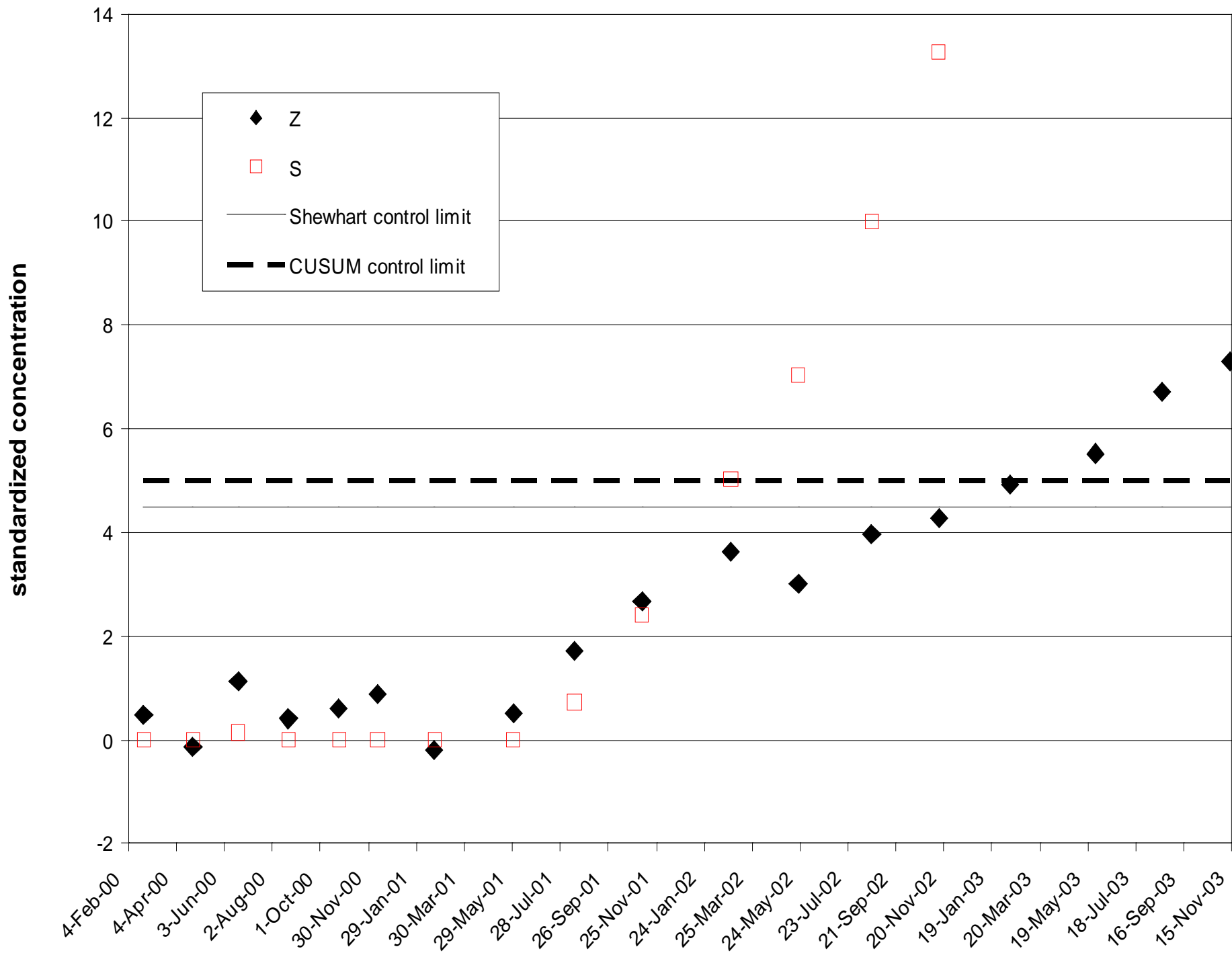
Control Chart for Monitoring Wells

Combined Shewhart – cumulative sum, if data are independently distributed & normal or log normal

Contamination at well monitored in two ways:
Shewhart control limit (SCL) & cumulative sum (CUSUM)

SCL: standardized mean (Z) for the given sample period exceeds 4.5 (rapid increase in contamination)

CUSUM: cumulative sum (S) of Z over all sampling periods exceeds 5 (rapid or gradual increase in contamination)





Concerns with ISL Operations

Restoring groundwater to pre-mining levels

Never achieved at an ISL mine

Rice (2006) documented failure to restore
at KVD's PAA1 and PAA2

Long-term risk of contamination at private wells
uranium, radium, arsenic, selenium

PAA-1 Baseline Wells Post-mining Water Quality

| Baseline Well ID | Date | pH (SU) | EC (µmhos/cm) | U (mg/L) | Cl (mg/L) | Ca (mg/L) | HCO3 (mg/L) | SO4 (mg/L) | Mo (mg/L) |
|---|---------|------------|---------------|----------|-----------|-----------|-------------|------------|-----------|
| EX-1 | - | - | - | - | - | - | - | - | - |
| EX-2 | 2/9/06 | 7.8 | 2590 | 1.53 | 253 | 166 | 376 | 655 | 0.01 |
| EX-3 | 2/27/06 | 6.7 | 1441 | 1.78 | 160 | 151 | 383 | 165 | 0.06 |
| I-1 | 2/9/06 | 6.9 | 2670 | 0.509 | 339 | 226 | 421 | 632 | 1.50 |
| I-2 | 2/9/06 | 7.8 | 1619 | 0.093 | 239 | 386 | 402 | 154 | 0.01 |
| I-3 | 2/27/06 | 7.0 | 2730 | 2.63 | 339 | 229 | 434 | 361 | 0.04 |
| I-4 | 2/9/06 | 7.0 | 1785 | 0.0 | 246 | 220 | 377 | 297 | 1.60 |
| I-5 | 2/9/06 | 6.8 | 1466 | 2.04 | 160 | 138 | 371 | 269 | 2.10 |
| I-6 | 2/27/06 | 10.6 | 4270 | 0.085 | 1210 | 396 | 634 | 69 | 0.04 |
| I-7 | 2/9/06 | 7.2 | 2010 | 0.085 | 273 | 207 | 377 | 354 | 3.80 |
| I-8 | 2/9/06 | 7.0 | 1135 | 0.636 | 133 | 339 | 333 | 142 | 1.00 |
| I-9 | 2/9/06 | 6.8 | 1677 | 0.932 | 140 | 201 | 390 | 422 | 2.60 |
| I-10 | 2/9/06 | 7.4 | 1443 | 0.195 | 146 | 298 | 484 | 136 | 3.50 |
| I-11 | 2/9/06 | 6.8 | 1197 | 1.27 | 100 | 273 | 346 | 226 | 1.60 |
| I-12 | 2/9/06 | 6.9 | 3300 | 0.0 | 346 | 220 | 465 | 495 | 2.20 |
| I-13 | 2/9/06 | 7.5 | 1544 | 2.63 | 240 | 254 | 320 | 127 | 0.55 |
| Average | - | 7.35 | 2058 | 0.961 | 288 | 247 | 408 | 300 | 1.37 |
| State Requirement | | 8.74 | 1717 | 0.164 | 234 | 20.8 | 268 | 204 | 0.06 |
| Meets State Requirement? | | - | No | No | No | No | No | No | No |
| State Restoration Range Table Upper Value | | 7.37 – 9.5 | 2100 | 1.89 | 352 | 74 | 505 | 310 | 0.84 |
| Less Than Upper Value? | | No | Yes | Yes | Yes | No | Yes | Yes | No |

Source:

Rice (2006)

PAA-2 Baseline Wells Post-mining Water Quality

| Baseline Well ID | Date | pH (SU) | EC (µmhos/cm) | U (mg/L) | Cl (mg/L) | Ca (mg/L) | HCO ₃ (mg/L) | SO ₄ (mg/L) | Mo (mg/L) |
|---|---------|-------------|---------------|----------|-----------|-----------|-------------------------|------------------------|-----------|
| 47 | 5/31/06 | 6.8 | 4940 | 9.50 | 692 | 358 | 695 | 1376 | 1.86 |
| 047 | 2/27/06 | 6.9 | 3630 | 0.170 | 891 | 270 | 94 | 394 | 0.05 |
| 240 | 2/9/06 | 7.4 | 1785 | 0.170 | 246 | 693 | 352 | 301 | 0.63 |
| 265 | 2/27/06 | 6.8 | 1518 | 1.27 | 166 | 166 | 421 | 204 | 0.12 |
| 491 | 2/9/06 | 7.6 | 1580 | 2.63 | 240 | 370 | 377 | 226 | 0.26 |
| Average | - | 7.1 | 2691 | 2.75 | 447 | 371 | 388 | 500 | 0.58 |
| State Requirement | | 7.37 – 8.66 | 1662 | 1.89 | 224 | 25.3 | 327 | 224 | 0.38 |
| Meets State Requirement? | | No | No | No | No | No | No | No | No |
| State Restoration Range Table per Value | | 7.37 – 9.5 | 2100 | 1.89 | 352 | 74 | 505 | 310 | 0.84 |
| Less Than or Equal to Value? | | No | No | No | No | No | Yes | No | Yes |

Source:

Rice (2006)

Consideration of Geochemical Issues in Groundwater Restoration at Uranium In Situ Leach Mining Facilities

NUREG/CR-6870 January 2007

Prepared by USGS for NRC

- ...it is difficult to predict how much time is required or even if the reducing conditions will return via natural processes. The mining disturbance introduces a considerable amount of oxidant to the mined region.....



Consideration of Geochemical Issues in Groundwater Restoration at Uranium In Situ Leach Mining Facilities

NUREG/CR-6870 January 2007

Prepared by USGS for NRC

- ...Lixiviant that has mixed into the groundwater with lower mobility during the mining operations (and mineral surfaces exposed to that groundwater) will continue to provide a source of contamination even after long periods of pumping and treatment.....



draft

GROUND WATER FLOWPATH

GROUND WATER LEVELS AND DIRECTION OF FLOW IN GOLIAD SAND KINGSVILLE AREA

The 1982 water level map of the Goliad Sand shows a pattern of concentric circles with the lines becoming closer together near the center. This pattern is called a cone of depression and is formed around major ground water discharges.

The center is an area of low pressure and causes ground water to flow toward it from all directions. In Kelberg County, the cone of depression has developed from pumping ground water in Kingsville for many decades.

The URI mine sites are well within this cone of depression.



EXPLANATION

- 100 WELL USED FOR CONTROL -- Number is altitude of water level
- 60 WATER-LEVEL CONTOUR -- Shows altitude at which water level would have stood in tightly cased wells. Contour Interval: 20 feet. National Geodetic Vertical Datum of 1929



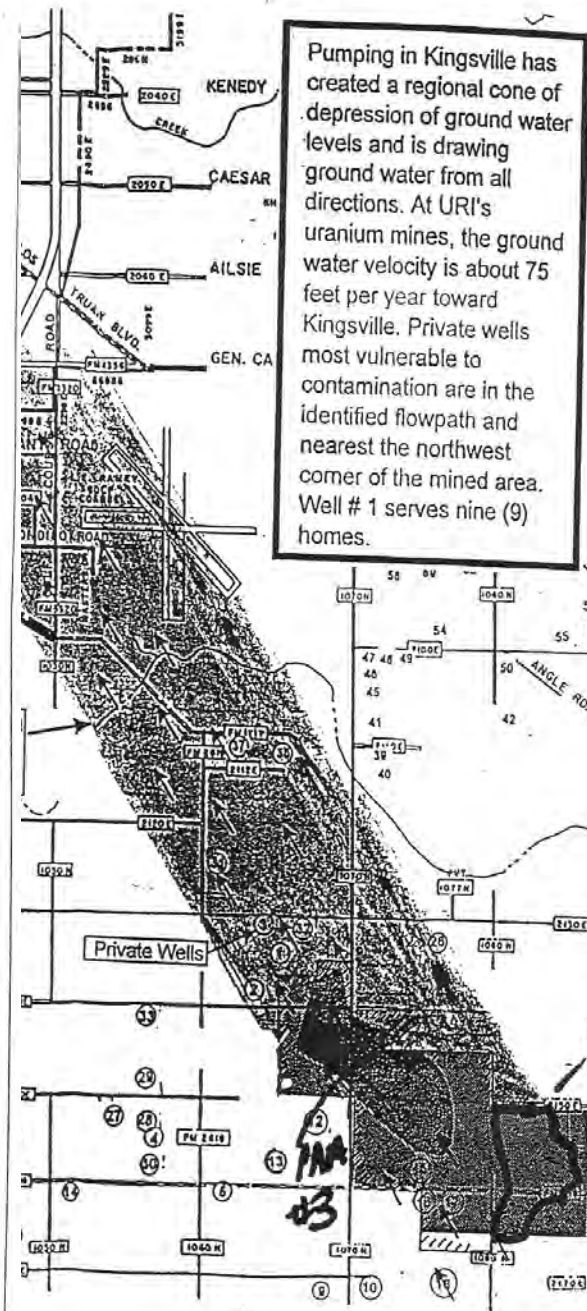
URI'S PAA3# SITE



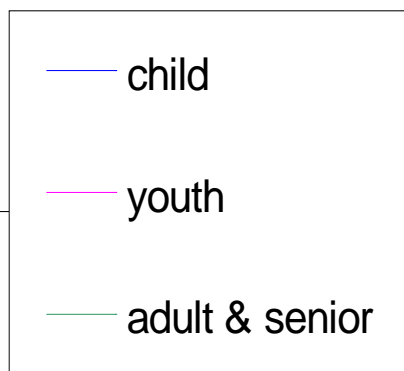
DIRECTION OF GROUND-WATER FLOW

U.S. Geological Survey Open-File Report 82-174

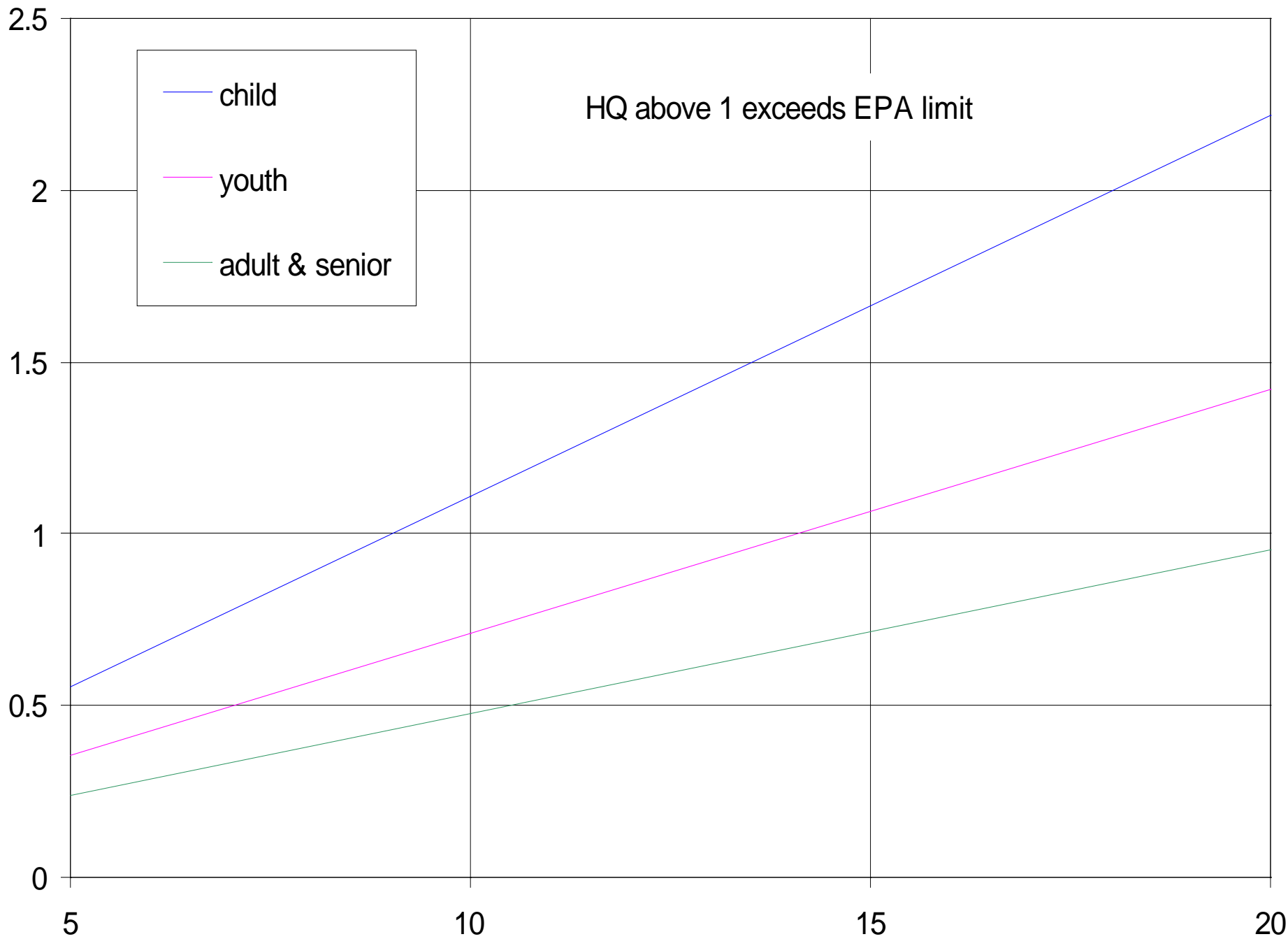
Pumping in Kingsville has created a regional cone of depression of ground water levels and is drawing ground water from all directions. At URI's uranium mines, the ground water velocity is about 75 feet per year toward Kingsville. Private wells most vulnerable to contamination are in the identified flowpath and nearest the northwest corner of the mined area. Well # 1 serves nine (9) homes.



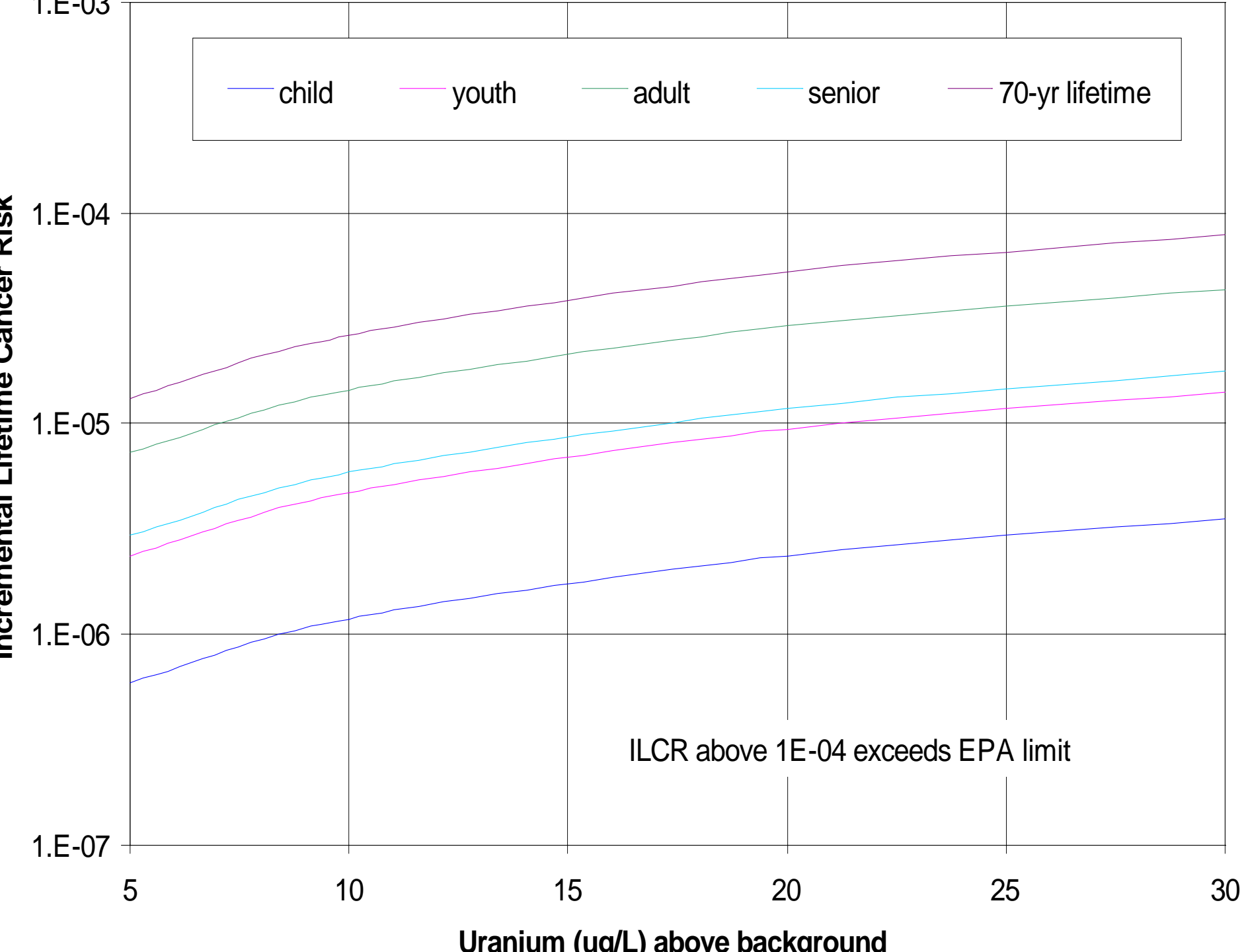
Hazard Quotient

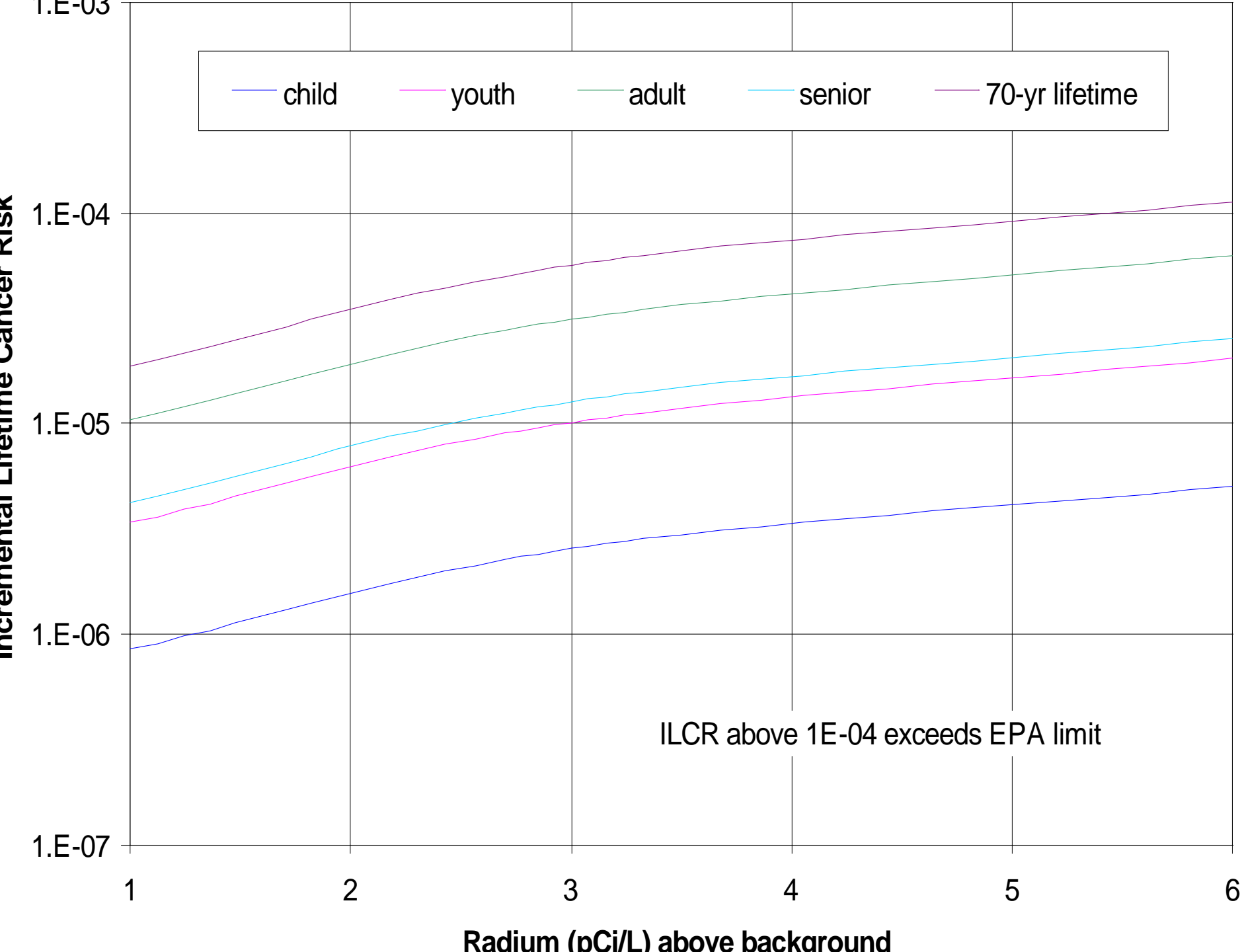


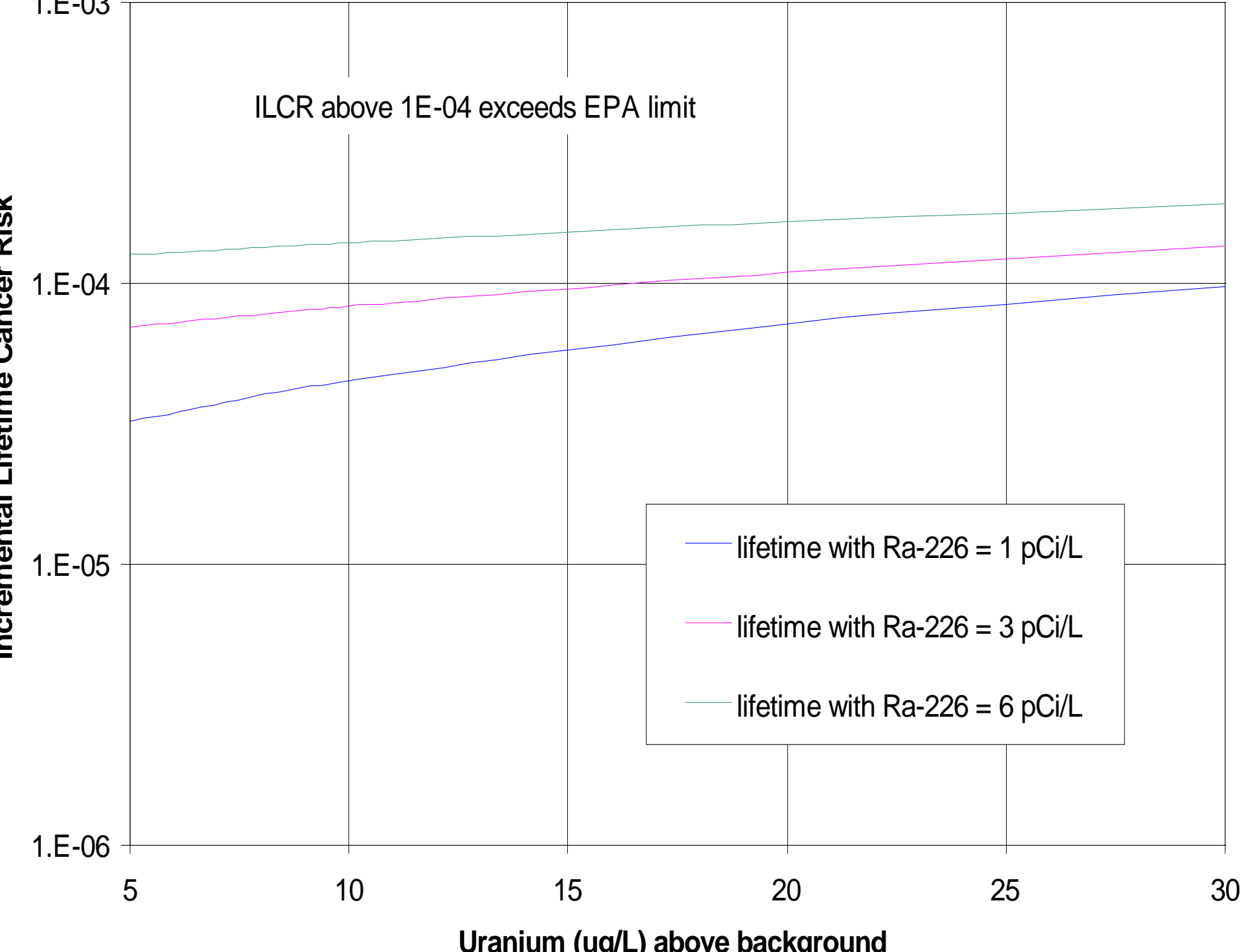
HQ above 1 exceeds EPA limit



Uranium ($\mu\text{g/L}$) above background







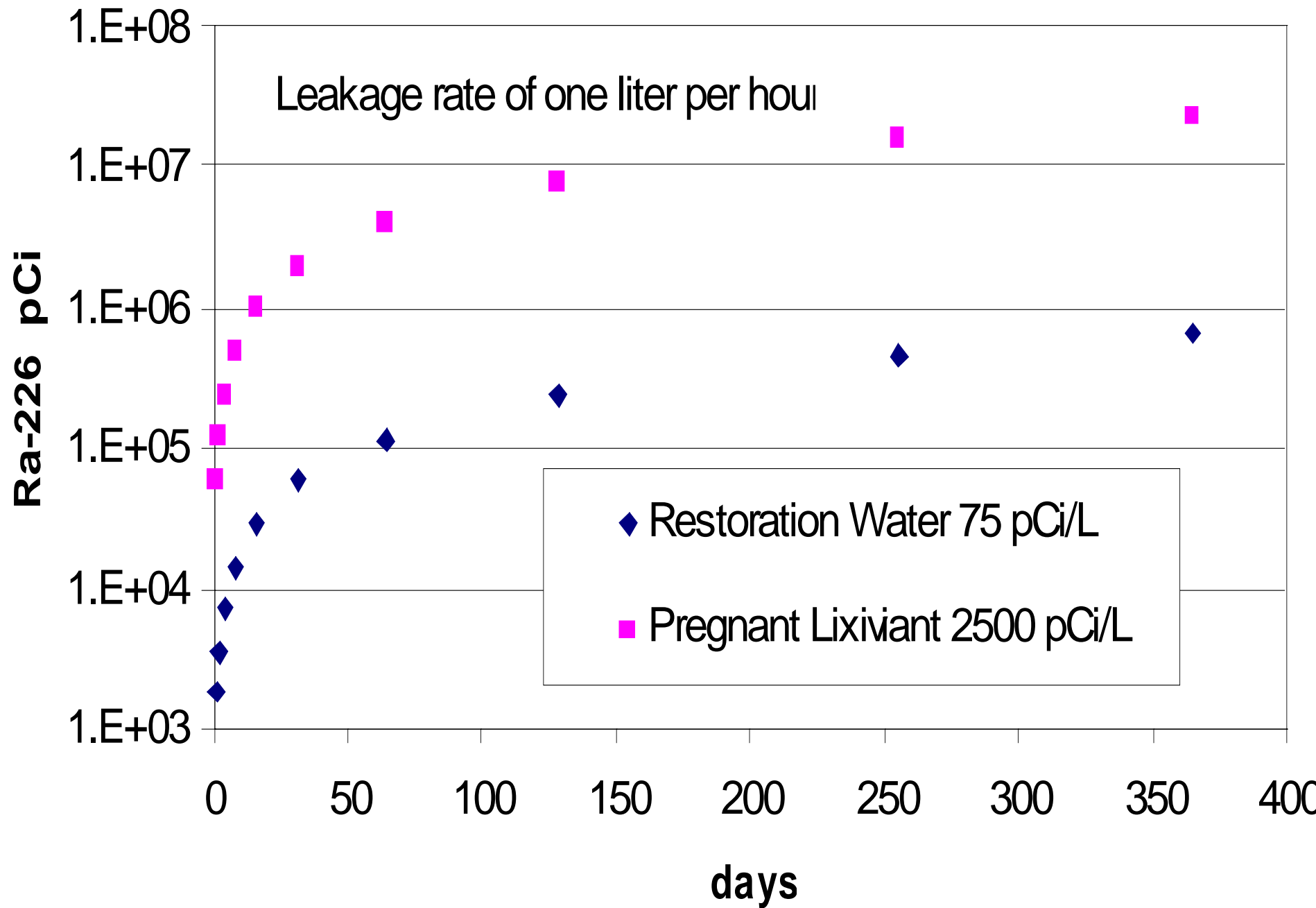


Concerns with ISL Operations

Soil Contamination from Spills & Fallout

Slow leaks in pipes do not trigger alarm
large volume over a long period of time

Radioactive fallout of radon daughters
thousands of Curies per year
one Curie is 1,000 billion picroCuries

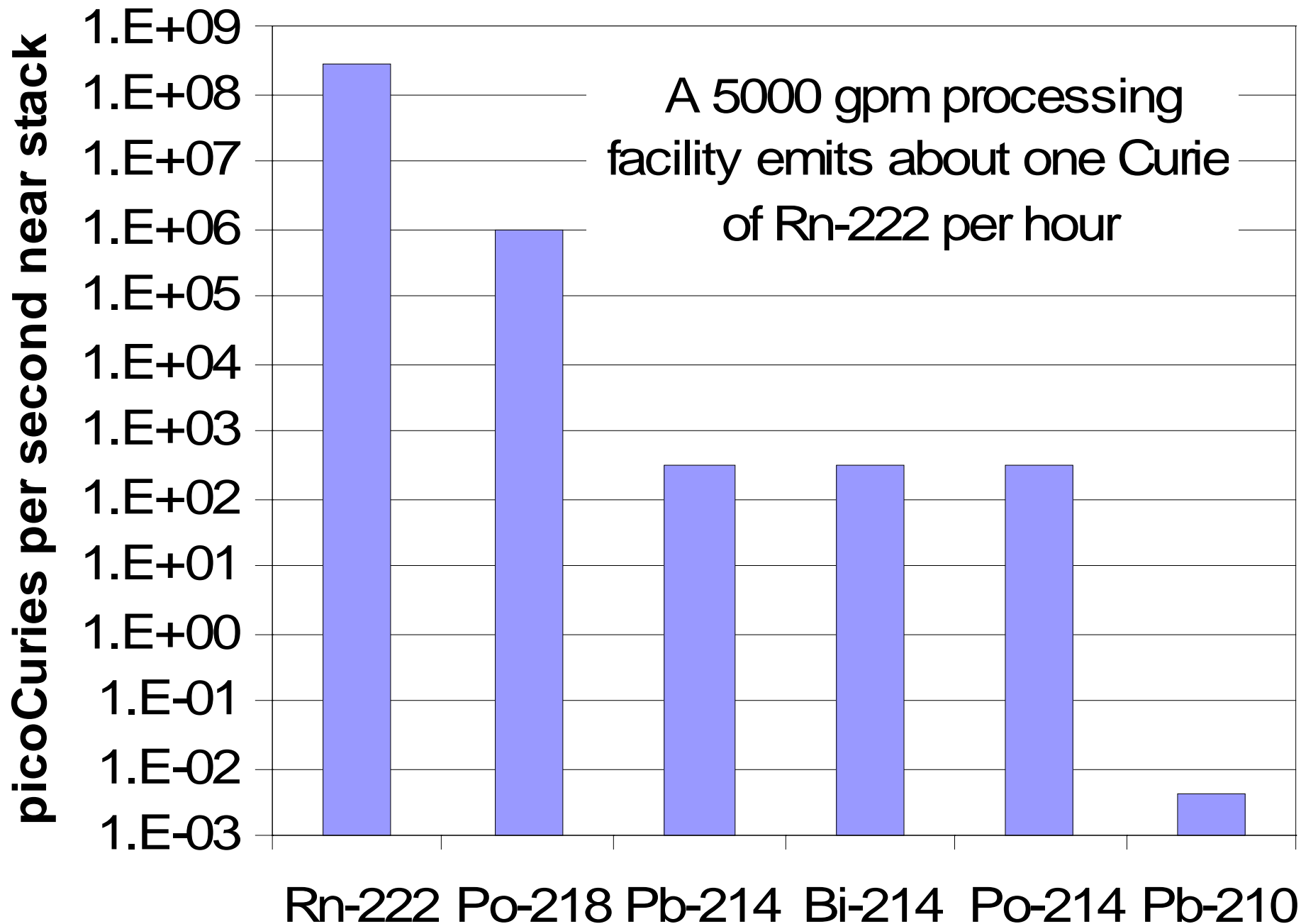


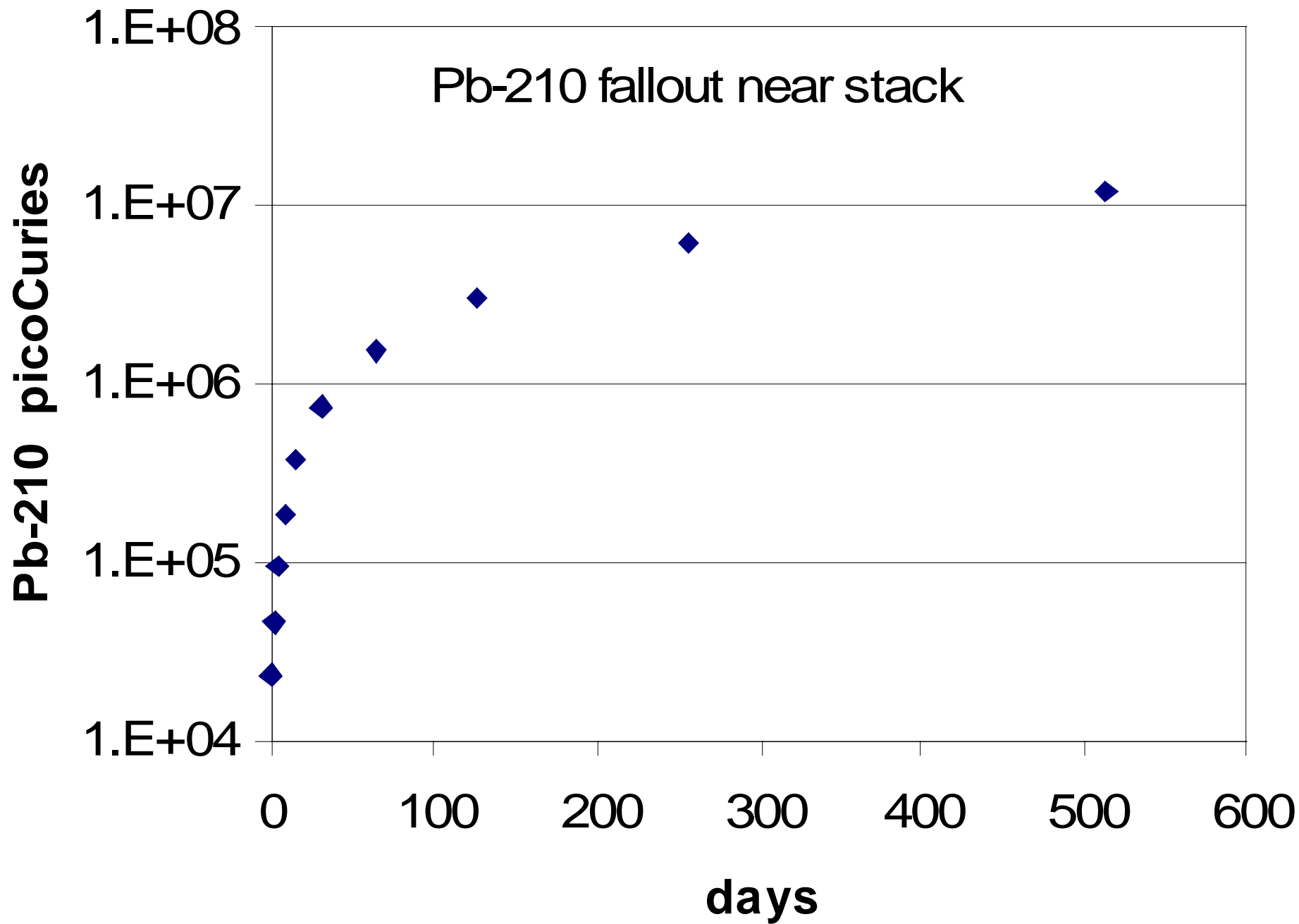


Risk associated with Ra-226 spill

If undetected and soil level reaches 100 pCi/g
Pipeline on resident property for 6 yrs
Resident is near pipe 1 hr/day 300 days/yr
ILCR = $1.36\text{E-}4$, exceeds EPA limit of $1\text{E-}4$

If undetected and soil level reaches 300 pCi/g
Child at school bus stop near pipeline for 6 yrs
180 days per year for one-half hour
ILCR = $1.18\text{E-}4$, exceeds EPA limit of $1\text{E-}4$







Risk associated with Pb-210 fallout

If resident is in fallout zone for 10 yrs
Outdoors 1 hour per day for 300 days/yr
Relaxing and breathing 3 pCi/m^3 at $1 \text{ m}^3/\text{hr}$
ILCR = $1.25\text{E-}4$, exceeds EPA limit of $1\text{E-}4$

If worker is in fallout zone for 2 yrs
Outdoors 4 hour per day for 300 days/yr
Working and breathing 3 pCi/m^3 at $1.5 \text{ m}^3/\text{hr}$
ILCR = $1.5\text{E-}4$, exceeds EPA limit of $1\text{E-}4$



PR with Mining Companies

Perform a Background Search

Financial stability

Resumes of personnel

Past operating experience

Environmental record



PR with Mining Companies

Request data for factual statements

Were the samples located & collected properly?

Did an approved lab analyze the samples?

What statistical methods were used on the data?

Cite all guidance documents that were followed



PR with Mining Companies

Demand integrity & honesty in their actions

If you care for the community, why are you not providing the data we ask for?

Why are you not using valid statistical methods to derive your baseline water quality values?

If facts are facts, where are the data to support the facts you are citing?

| | DATE | U (mg/L) |
|-------------------|-----------|----------|
| Garcia - old well | 26-May-87 | 0.014 |
| Garcia - old well | 31-Mar-88 | 0.011 |
| Garcia - new well | 13-Dec-96 | 0.184 |
| Garcia - new well | 23-May-97 | 0.220 |
| Garcia - new well | 29-Aug-97 | 0.152 |
| Garcia - new well | 25-Feb-98 | 0.189 |
| Garcia - new well | 27-Aug-98 | 0.158 |
| Garcia - new well | 25-Nov-98 | 0.209 |
| Garcia - new well | 26-Mar-99 | 0.200 |
| Garcia - new well | 21-Jun-99 | 0.181 |
| Garcia - new well | 24-Aug-00 | 0.151 |
| Garcia - new well | 19-Sep-00 | 0.187 |
| Garcia - new well | 6-Nov-00 | 0.168 |
| Garcia - new well | 19-Feb-01 | 0.184 |
| Garcia - new well | 11-Jun-01 | 0.179 |
| Garcia - new well | 13-Sep-01 | 0.160 |
| Garcia - new well | 17-Dec-01 | 0.240 |
| Garcia - new well | 21-Mar-02 | 0.164 |
| Garcia - new well | 26-Jun-02 | 0.141 |
| Garcia - new well | 30-Sep-02 | 0.172 |
| Garcia - new well | 13-Dec-02 | 0.188 |
| Garcia - new well | 11-Mar-03 | 0.180 |
| Garcia - new well | 23-Jun-03 | 0.172 |
| Garcia - new well | 26-Sep-03 | 0.170 |
| Garcia - new well | 12-Dec-03 | 0.187 |

Where are the data for the new well for the period 1989 to 1996?

Can you sample the old well to demonstrate that uranium is still at the level observed in 1988?

If you refuse, you are disingenuous in your claim to care for the community.



PR with Mining Companies

Require clear definitions of terms

Restoration values – values established improperly by mining company and regulators to set groundwater restoration goals and bonding (subject to change by regulators).

Premining levels for contaminants – levels that are naturally occurring in the groundwater prior to mining and do not change.



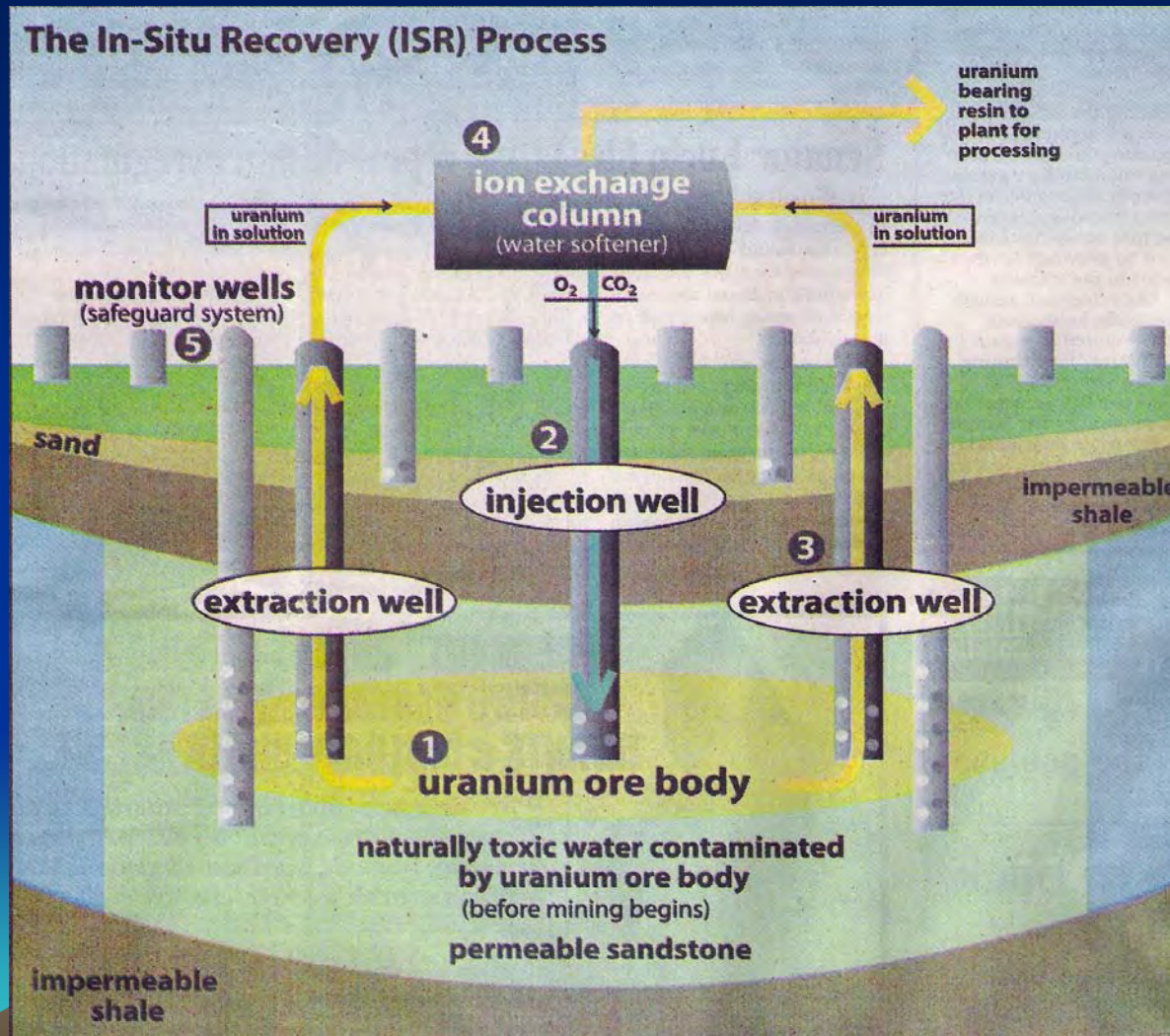
PR with Mining Companies

Require clear definitions of terms

Baseline water quality – water quality established using statistically valid sampling locations, documented collection techniques, approved analytical laboratories and proper statistical methods for manipulating data.

Excursion limit – statistically valid limit that ensures protection of groundwater outside of the monitoring well ring

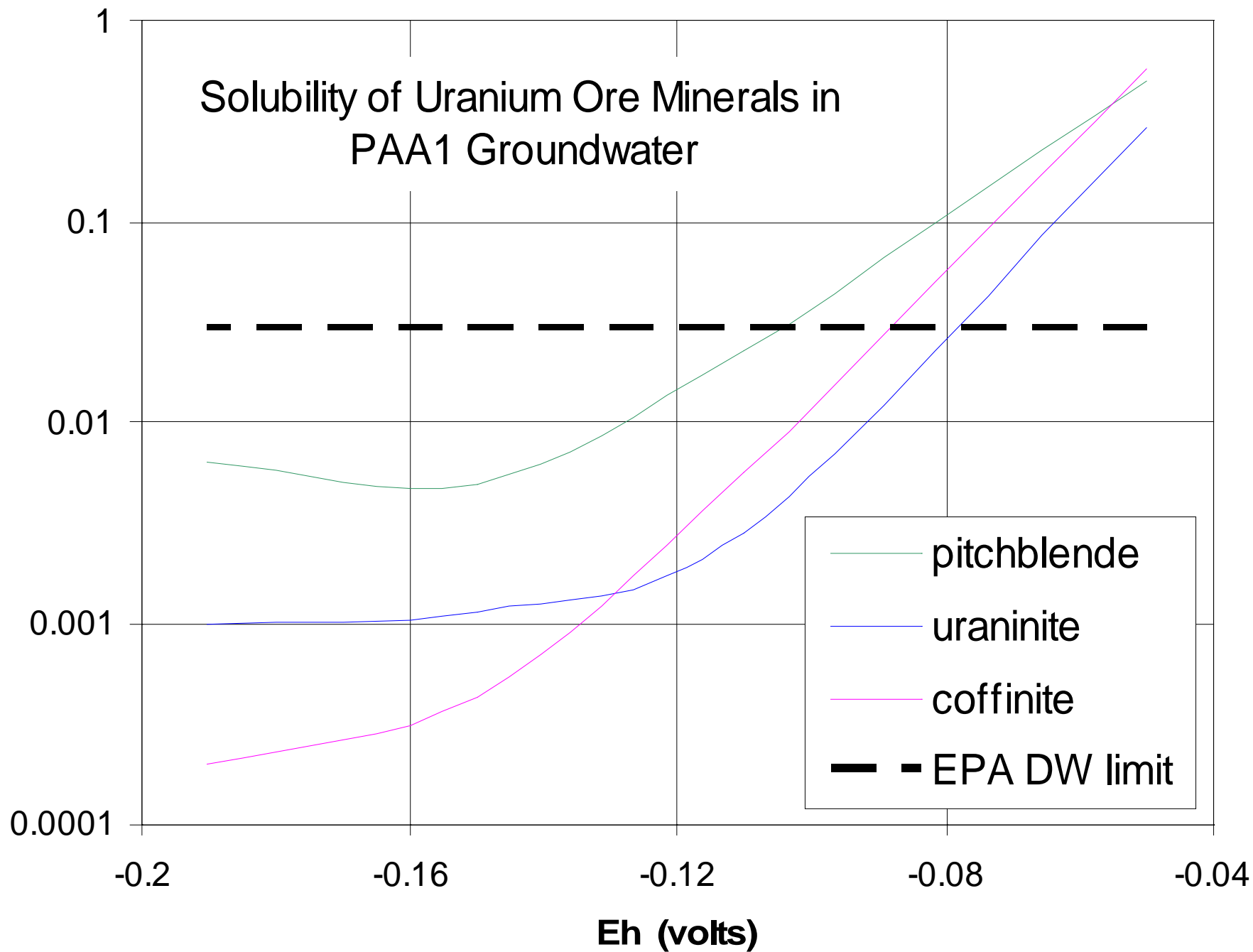
PR with Mining Companies



“However, the groundwater that is within and around the ore body is not safe to drink – it is naturally toxic because of the uranium ore and its byproducts.”

Solubility of Uranium Ore Minerals in PAA1 Groundwater

Uranium (mg/L)



**PAA-1 Baseline Wells
Pre-mining Water Quality**

| Constituent /Property | I-6 | I-7 | I-8 | I-9 | I-10 | I-11 (161) | I-12 (PBL-4) | I-13 |
|----------------------------------|--------------|--------------|--------------|-------------|-------------|-----------------------|-------------------------|--------------|
| Arsenic | 0.02 | 0.002 | 0.001 | 0.002 | 0.001 | 0.001 | 0.022 | 0.005 |
| Cadmium | 0.03 | 0.01 | 0.01 | 0.01 | 0.01 | <0.01 | <0.01 | <0.01 |
| Fluoride | 0.6 | 0.53 | 0.51 | 0.52 | 0.53 | 0.63 | 0.6 | 0.56 |
| Mercury | 0.01 | <0.001 | <0.001 | <0.001 | <0.001 | 0.0002* | <0.0002 | <0.001 |
| Nitrate (N) | <0.02 | <0.1 | <0.1 | <0.04 | 0.35 | <0.1 | 0.5 | 0.95 |
| Selenium | 0.072 | 0.001 | <0.001 | 0.003 | <0.001 | <0.001 | 0.001 | 0.009* |
| Tha Radiation | NA | NA | NA | NA | NA | NA | NA | NA |
| Radium 226 | 13 | 21.6 | 42.1 | 43.5 | 23.1 | 0.66 | 0.84 | 12.1 |
| Radon-222 | NA | NA | NA | NA | NA | NA | NA | NA |
| Uranium | 0.68 | 0.077 | 0.180 | 0.13 | 0.009 | 0.008 | 0.016 | 0.156 |
| Chloride | 229 | 234 | 229 | 229 | 219 | 352* | 242 | 231 |
| Iron | <0.02 | 0.03 | 0.05 | 0.05 | 0.02 | 0.11 | <0.01 | <0.01 |
| Manganese | <0.001 | 0.02 | 0.01 | <0.01 | <0.01 | <0.01 | 0.03 | <0.01 |
| pH | 8.58* | 8.85* | 8.42 | 8.62* | 8.48 | 7.82 | 8.71* | 8.45 |
| Molybdenum | 0.014 | 0.09 | 0.05 | 0.08 | <0.01 | <0.1 | 0.2 | <0.01 |
| Sulfate | 189 | 235 | 226 | 212 | 199 | 81 | 229 | 179 |
| EC | 1710 | 1740 | 1730 | 1670 | 972 | 1680 | 1750 | 1720 |
| TDS | 1030* | 1030* | 1030* | 975* | 972* | 944* | 972* | 988* |

Source:
Rice (2006)

Baseline Water Quality in Ore Zone Crownpoint, New Mexico

| WELL | Ca | Mg | Na | K | CO3 | HCO3 | SO4 | Cl | As | Mo | Se | U | Ra-226 |
|------|-----|-------|-----|-----|-----|------|-----|------|--------|--------|--------|-------|--------|
| mg/L | | | | | | | | | | | | | pCi/L |
| CP-1 | 1.4 | 0.34 | 138 | 5.9 | 53 | 170 | 50 | 15 | 0.0005 | 0.0100 | 0.0005 | 0.006 | 0.9 |
| CP-2 | 120 | 12 | 298 | 847 | 0 | 171 | 70 | 1325 | 0.0008 | 0.0100 | 0.0005 | 0.014 | 391 |
| CP-3 | 5.5 | 1.7 | 161 | 41 | 17 | 229 | 133 | 42 | 0.0005 | 0.0060 | 0.0005 | 0.003 | 1.8 |
| CP-4 | 0.7 | 0.03 | 132 | 9.2 | 140 | 9 | 45 | 6 | 0.0005 | 0.0050 | 0.0005 | 0.001 | 0.8 |
| CP-5 | 2.9 | 0.2 | 102 | 1.7 | 6 | 222 | 35 | 2.5 | 0.0007 | 0.0050 | 0.0005 | 0.012 | 1.0 |
| CP-6 | 1.6 | 0.1 | 109 | 2.4 | 23 | 202 | 35 | 3.5 | 0.0008 | 0.0050 | 0.0005 | 0.001 | 0.5 |
| CP-7 | 0.9 | 0.037 | 118 | 5.6 | 62 | 149 | 33 | 3 | 0.0011 | 0.0075 | 0.0005 | 0.001 | 0.4 |
| CP-8 | 2.5 | 0.2 | 112 | 2.2 | 24 | 205 | 38 | 3.5 | 0.0005 | 0.0088 | 0.0005 | 0.004 | 0.8 |

“It is horrifying that we have to fight our own government to protect the environment.”

Ansel Adams

“Never doubt that a small group of thoughtful, committed citizens can change the world.

Indeed, it is the only thing that ever has.”

Margaret Mead